

# EXHIBIT “AM”

Williams

Do you see that?

A Yes.

Q Is that your handwriting?

A Yes.

Q Next day, Monday, says in at 12:00,  
lunch, out 3:00 lunch, in 4:00, out 8:00.

Is that your handwriting?

A Yes.

Q Next day, although crossed out, says  
in at 12:00, out at 8:00.

Is that your handwriting?

A Yes.

Q Next day says Wednesday, in at  
12:00, out at 3:00 lunch, in, out at 8:00.

Is that your handwriting?

A Yes.

Q Now, you worked, according to your  
log, Tuesday night, October 31st; is that correct?

A Yes. Was that Tuesday?

Q It's Tuesday. Take it from me, it's  
Tuesday.

A Okay.

Q The next night you came in, but you  
did not work; is that correct?

Williams

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A Yes.

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Q Did you fill out this time sheet in advance that says Wednesday, November 1st?

5

A I don't remember.

6

Q But that is your handwriting?

7

A Yes, it is.

8

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Q Did you not work Wednesday night, November 1st?

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A That is the night I came to work and was told to go home.

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Q Do you know when you filled in that date for Wednesday, November 1st?

14

A No, I do not.

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Q Do you know if it was before Wednesday, November 1st?

17

A I do not know or remember.

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Q Just to clarify, you didn't come in, you didn't work starting at 12:00, take lunch at 3:00 to 4:00, and leave at 8:00 on Wednesday, November 1st; is that correct?

22

23

A On Wednesday I came in at 12:00, and I was asked to leave. I left.

24

25

Q So you didn't work an eight-hour shift that day?

1 Williams

2 A No, I did not.

3 Q You don't know when you filled in  
4 this time sheet?

5 A No, I do not.

6 MR. SPUND: Let's get this  
7 marked, please.

8 (Letter dated 11/10/06 to  
9 George Lino from Charles Williams,  
10 Bates No. P0128, was marked as  
11 Defendants' Exhibit O for  
12 identification, as of this date.)

13 BY MR. SPUND:

14 Q Mr. Williams, I show you what has  
15 been marked as Exhibit O. That's P128, a letter  
16 dated November 10, 2006.

17 Is that your signature on the  
18 letter?

19 A (Perusing document.) Yes, it is.

20 Q Did you send that letter to Mr.  
21 Lino?

22 A Yes, I did.

23 Q This was sent on November 10th.

24 Did you speak to anyone at Palladia  
25 between your conversation with Mr. Lino on or

# EXHIBIT “AN”

Williams

employment."

A Yes.

Q "Retaliation. Other acts, no  
increase in wages after one year."

Do you see that?

A Yes.

Q And then on the bottom, Paragraph 6,  
it says, "I believe the defendant is still  
committing these acts against me."

What do you mean by that?

A The lady had decided that they  
wanted to file a suit against me for unemployment,  
trying to stop my unemployment.

Q Well; they didn't file a suit, they  
contested your unemployment.

A I was already collecting it when  
they tried to collect. They were trying to stop  
my income, stop me from feeding my family.

Q By the way, are you married?

A I'm divorced.

Q Do you have children?

A Yes.

Q How many?

A One and two steps.

Williams

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Q Any of them live with you?

3

A Now, no.

4

Q Did any of them live with you when

5

you were working at Palladia?

6

A Yes.

7

Q Which ones?

8

A My son.

9

Q How old is your son?

10

A Twenty-four.

11

Q In 2005 he would have been how old,

12

21, 22?

13

A Twenty-two.

14

Q Was he working at the time?

15

A I don't know.

16

Q When did he stop living with you?

17

A I don't know.

18

Q How old are your other children?

19

A Eighteen and 14.

20

Q Are they living with you?

21

A No.

22

Q Do you live with anyone?

23

A No.

24

Q In 2006, 2007 when you were

25

collecting unemployment, other than yourself, were

Williams

you supporting anyone?

A No.

Q Paragraph 7 says, "Defendant discriminated against me based on my," and you checked off "color, complexion, gender," correct?

Do you see that?

A Yes.

Q Is it your contention that you were discriminated against because of your color?

A I guess, yes.

Q What is the basis of that?

A I don't know. That I'm African-American male.

Q Ms. Workman is African-American, correct?

A I think so.

Q She is sitting here next to me.

Is Ms. Workman African-American?

A If that's what she wants to be called, African-American, yes. I don't know.

Q So you are saying that Ms. Workman discriminated against you because you are African-American?

A Because I am African-American,



Williams

because I'm light skinned, yes.

Q Do you know of any other African-American she discriminated against because of their color?

A Possibly.

Q Who?

A I don't know.

Q By the way, did you ever file a complaint with Palladia in human resources or anyone else alleging that Ms. Workman discriminated against you because of your color?

A No, I did not.

Q You say here also gender.

A Yes.

Q Sex, male, I guess.

A Yes.

Q She discriminated against you because you were a male?

A Yes.

Q She hired you, correct?

A I don't know. I guess she did.

Q She was the last interview you had?

A Yes. Her and Ms. Gilmore were the last interview before.

# EXHIBIT “AO”

Williams

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Q She was the one that told you you  
3 were hired?

4

A I don't remember that.

5

Q What is the basis of your statement  
6 that she discriminated against you because you  
7 were male?

8

A Just the way I was being treated.

9

Q What do you mean?

10

A I was being harassed about sitting  
11 in a chair. I was being harassed by calling in on  
12 a day on my own time out of work. I was denied  
13 vacation.

14

Q When you say you were harassed about  
15 the chair, that's that incident where you got the  
16 letter regarding sitting at Jennifer's desk?

17

A In Jennifer's chair.

18

Q Did you get any other letters in  
19 relation to that subject after that June letter of  
20 2006?

21

A I don't remember. I don't think so.

22

Q Did anybody ever speak to you again  
23 about that issue?

24

A I don't remember.

25

Q The incident relating to your

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Williams

vacation, was that one time on July 1st; is that correct?

A Right.

Q Are there any other incidents that you can tell me of Ms. Workman harassing you because of your, let's start with gender?

A No.

Q Can you think of any other incidents of Ms. Workman harassing you because of your race?

A I told you I only saw Ms. Workman five or six times while I was there.

Q Let's go to the next page of the complaint, Paragraph 8.

In that paragraph you state the following. "I was terminated from my place of employment, Palladia, Inc., on October 30, 2006. This was an unlawful and discriminating act by Palladia. This act was committed by Corinne Workman, who had been harassing me because of my gender and my race. Corinne coerced other female employees to lie about the incident."

Did you write that?

A No.

Q Who typed that in?

# EXHIBIT “AP”

Williams

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A The Human Rights Commission.

3

Q This is a Federal District Court

4

complaint.

5

Did you go down to the Federal Court

6

and speak to the pro se office there --

7

A Yes.

8

Q -- about filing this complaint?

9

A Yes, I did.

10

Q Did they type in this information?

11

A No.

12

Q Who typed that?

13

A This was a copy of what had been

14

written by the Human Rights Commissioner.

15

Q Is this a copy of the complaint that

16

you filed with the Human Rights Commission?

17

A Yes.

18

Q I am going to show you what has been

19

marked as Exhibit G, which is the complaint from

20

the Human Rights Commission, which you identified

21

before, which you signed, correct?

22

A Yes.

23

Q Can you tell me where in that

24

complaint it says that Ms. Workman was harassing

25

you because of your gender and your race?

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Williams

A It says, "The above-named respondent violated Title VII, Page 2, of the Civil Rights Act of 1964."

Q Again, does it say anywhere that she harassed you because of your gender and your race?

A No. 4 says "I was wrongfully terminated from my employment due to my gender. Supervisor harbors animus against me."

Q "Against men," it didn't say against you.

A Right.

Q My question is, is there anything that says she was harassing you because of gender and race?

I agree you were terminated. I agree with you.

In your complaint to the State Division it says you were terminated because "Ms. Workman has animus toward me." I agree with you, it says that in this document.

My question is more focused on your complaint where you say "This act was committed by Corinne Workman who had been harassing me because of my gender and race."

Williams

I'm trying to find out where these words came from, since you said you didn't type this out?

A My secretary typed it.

Q You have a secretary?

A Yes, I do.

Q Who does the secretary work for?

A She works for me.

Q Does she get paid?

A Sometimes.

Q What is the name of the secretary?

A I would rather not say.

Q Mr. Williams, you can't come in here and say my secretary typed it out and then don't tell me who the secretary is.

You have got to answer the question, sir.

A I don't remember.

Q We are talking about the complaint. I just want to go to the next document, the complaint.

Go to the next page, Page 5, please.

Is that your signature on the bottom of that page?



# EXHIBIT “AQ”

1 Williams

2 Q Anything else?

3 A And the fact that she fired me, yes.  
4 I would call that harassment. Fire me for an  
5 erroneous and -- for no reason, basically.

6 Q Am I correct you never spoke to her  
7 after October 31, 2006?

8 A I don't remember speaking to her  
9 after that. I spoke to Mr. Lino. All my  
10 correspondence was with Mr. Lino.

11 Q So your testimony that she fired  
12 you, that's what you meant by harassment?

13 A Yes.

14 Q And she fired you because you are an  
15 African-American?

16 A Yes, I think she fired me because  
17 she wanted to have a woman working in that spot.  
18 She fired me because she didn't like me,  
19 basically.

20 Q She didn't like you because you were  
21 a man?

22 A I think that was part of it.

23 Q What is the basis of that statement  
24 that she didn't like you because you are a man?

25 A The way I saw the other men that

1 Williams

2 were treated in this particular company.

3 Q What other men did you see treated  
4 in this particular company?

5 A Michael Williams, George Lino, the  
6 guy who got fired from the office that worked  
7 behind me, the janitor, the super and also now  
8 also Mr. Lino, who no longer works for Palladia.

9 Q Do you know why any of these people  
10 no longer work for Palladia?

11 A I would say because they were men.

12 Q Do you have any basis for that  
13 statement?

14 A No. Just my observations.

15 Q You next say Corinne "coerced other  
16 female employees to lie about the incident."

17 A Yes.

18 Q What is the basis?

19 A Ms. Danowsky came to the  
20 unemployment coordinator and lied.

21 Q That's not my question.

22 My question was, you say she lied,  
23 you say Ms. Corinne coerced other female employees  
24 to lie.

25 I am trying to understand what the

# EXHIBIT “AR”

Williams

basis of the statement is that she coerced other female employees?

A She brought Ms. Danowsky to court and had her testify against, try to testify against me saying that I falsified a document or that I was not doing my job.

Q How do you know she coerced her? Coerced is a word that says you forced somebody.

Do you have any evidence?

A If she didn't come down and do this, she probably would have lost her job, Ms. Danowsky.

Q How do you know that?

A I don't know that.

From my observation, what's going around Palladia, once she testified against me, Ms. Danowsky was promoted.

Q How do you know that?

A When I called this, we called from the unemployment place for her testimony, she answered the phone and told us that she had a new title. She said my new title is so and so and so and so.

Q My question is you allege that

Williams

Ms. Workman coerced other female employees to lie about things.

I am asking what the basis of your statement is that she coerced them or forced them?

A The employee, Ms. Danowsky, perjured herself at the hearing prior to collaborating with Ms. Workman on the incident on October 31st.

Q How did she perjure herself?

A She gave wrong information and incorrect information and contradictory information.

Q My question is more fundamental. I'm still trying to understand your statement.

It is your statement that Ms. Workman coerced her, you used the word, I didn't use it, sir, you used it in a complaint that you signed.

A It's not clear which part is not clear. Exactly what she said.

Q I want to know, you are making allegations that Ms. Workman "coerced other female employees to lie about the incident."

I want to know what the basis of that statement is. Do you have any evidence?

Williams

A No, I don't.

The evidence is in the testimony of the New York State Department of Labor where we have Ms. Danowsky's testimony and it's contradictory each time she testified.

When she testified, when Ms. Workman was present, she testified to one thing. When we spoke to her at the hearing, the next time her testimony was something different.

Q Why is that an indication that she was coerced?

A Because it's obvious. Why would she lie?

Q You are assuming she lied, sir.  
Let's go to the next paragraph.

A So did the judge.

Q It is Ms. Workman's claim that you falsified documents.

A It's untrue.

Q I think you have explained, we understand what the falsification of the documents is.

I think we are talking about the time sheet?

# EXHIBIT “AS”



Williams

A It never became clear what document she was trying to say that I falsified. First they are trying to say I falsified the time. Then she was trying to say I falsified the time sheet.

She was reaching for things and she was just reaching for things, looking for excuses or a way to try to terminate me because she never made it clear which documents were falsified.

Q Why would she want to terminate you?

A She didn't like me, not that I didn't do my job, I did my job excellently.

Q Why didn't she like you?

A I was too opinionated.

Like I said, I told her the super should be coming to work at 6:00 o'clock. Once I made a mistake telling her what she might do or should do, it was all downhill. She did not like people telling her what to do, make suggestions to her.

Once I made that suggestion that one day, it was downhill. She felt that you can't tell me nothing, you shouldn't tell me nothing.

Q Basically downhill, she ended up firing you because you were too opinionated, she

# EXHIBIT “AT”

Williams

12 months. The results of this request were increased harassment and my termination based on erroneous information."

You see that?

A Yes.

Q Tell me about the raise issue.

A I had been working there for a year. I thought I should get a raise.

Q Who did you ask for a raise?

A I don't know. I don't remember. More likely it was Ms. Workman.

Q Do you remember specifically?

A It wasn't like I put it in writing or anything.

Q Do you remember discussing it with Ms. Workman?

A I can't say I remember a specific conversation. I know we had. I'm pretty sure we talked about it, as well as speaking to Ms. Gilmore.

Q Did anybody tell you that Palladia gives COLA raises on a yearly basis once a year?

A No.

Q When you spoke to this person about

# EXHIBIT “AU”

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Williams

the raise, what did they tell you?

A I don't remember.

That I wasn't getting it, obviously.  
I just felt, as most employees do, after you work  
for somebody for a year, either I'm doing my job  
good or I'm not. If I am doing my job correctly,  
I want a raise.

Q Do you know who made what policy  
regarding a raise, when they would give a raise?

A No.

Q Did you ever call anyone in human  
resources and ask them that question?

A I believe I spoke to George Lino.

Q What did Mr. Lino tell you regarding  
the raise issue?

A He said that it's up to Corinne, I  
believe.

Q Do you believe or do you remember  
having that conversation?

A I remember, yes. I don't remember  
exactly what he said. I discussed it with  
Mr. Lino.

Q You remember discussing the raise  
with Mr. Lino?

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A Yes.

Q But you don't remember the exact conversation?

A No.

Q Do you remember Mr. Lino telling you anything about the cost of living increases that Palladia gives or doesn't give?

A No.

Q Do you remember Mr. Lino telling you raises are given on a yearly basis?

A No.

Q Did you ever discuss it with Ms. Workman?

A I don't remember. I'm not sure.

Q The next sentence says, "The results of this request was increased harassment based upon erroneous information."

The result of this which you are talking about is referring back to the request for a raise?

A Yes.

Q You say "increased harassment." What do you mean by that?

A That's when I started getting stuff

Williams

like chairs, don't sit in this chair and being terminated.

Q Well, the incident with the chair was in June, the incident with your vacation was July 1st.

You said here that you had been working for 12 months, you asked for a raise. That would be October.

I am trying to understand. Other than the incident that occurred for your being terminated, were there any other incidents or increased harassment that you can tell me about?

A I don't know. I don't remember.

I know in September I spoke about a raise. I didn't put it in writing, but I spoke. I don't remember if it was Corinne or Doretha. It was the one who was the secretary.

Q You don't recall what they told you?

A No. I know they told me, I think she said it would be up to Corinne.

Q Do you know if anybody got raises at Palladia that year?

A No, I don't know.

Q Mr. Williams, is there anything else

# EXHIBIT “AV”



Williams

that you can tell me that would support your allegations that you were terminated because you were a male?

A Yes. The fact that there was no other reason to terminate me. I was doing my job. You could see by the evaluations that I was getting every three months I was doing my job.

Q Those evaluations by Ms. Workman, right?

A Yes.

Q Those were good evaluations, right?

A Yes. The first six months, yes.

Q So why would Ms. Workman, if she gave you good evaluations, terminate you because you were a male when she hired you and when she gave you good evaluations?

A I don't know.

Q Do you have any evidence, anything else to tell me about her animus toward men or the harassment that you underwent other than what you told me?

A No. Just that all the men around there were being fired.

Q All the men?

1 Williams

2 A Yes. There are very few and they  
3 were being fired. They were either transferred or  
4 fired. One way or another they were moved out of  
5 there.

6 Q Do you know if they were transferred  
7 to other jobs, other agencies?

8 A Some were. They didn't transfer  
9 because they wanted to, I don't believe. They  
10 were transferred because she wanted them out.

11 Q Some of them transferred because  
12 they went from part time to full time?

13 A Possibly.

14 Q That would be, I guess, a good  
15 thing, right, going from a part-time to a  
16 full-time job?

17 A Yes, I guess.

18 Q That wouldn't be any indication of  
19 any type of animus toward men, would it?

20 A I guess not. Some guys were fired.

21 Q But you don't know the reason?

22 A And she fired them.

23 Q You don't know the reason why they  
24 were fired?

25 A No. I mean, no. I didn't read the

1 Williams

2 report.

3 No, I don't have privy to that  
4 information, any men being fired.

5 Q We sent you copies of personnel  
6 files, didn't we?

7 A I know I didn't look at that file, I  
8 didn't.

9 MR. SPUND: Let's take a break  
10 for a few minutes. -

11 I want to speak to  
12 Ms. Workman.

13 (Whereupon, at 2:27 o'clock  
14 p.m., a recess was taken to 2:30  
15 o'clock p.m.)

16 (The deposition resumed with  
17 all parties present.)

18 C H A R L E S W I L L I A M S, resumed and  
19 testified further as follows:

20 BY MR. SPUND:

21 Q Just a couple more questions.

22 You said on the night of October  
23 31st you were sitting in Flora Vista?

24 A Yes.

25 Q Did anyone ever tell you that you

# EXHIBIT “AW”

November 3, 2006

On Tuesday October 31<sup>st</sup>, 2006, I Lizzette Danowsky, House Manager of Dreitzer House was on duty at Flora Vista for the 12midnight to 8am shift.

At 12:20am Wednesday morning I went over to Dreitzer House to pick up Flora Vista's keys. I noticed that there was no one sitting at the security desk. I waited a few minutes and than I checked the security book to see who was on duty. Charles Williams was signed in by Ms. Sherri Manson and Charles Williams himself signed in at 12:00am. I waited. Around 1:00am I began to get worried so I decided to check the building! I checked the bathrooms, staff offices, and stairwell from floor one to seven. There was no sign of Charles Williams, I called Ms. Gilmore. I explained to Ms. Gilmore what was going on and that I had tried to call him on his cell but it was off. Ms. Gilmore asked me to stay there and make rounds of the building again. I made rounds again from top to bottom and than waited. Charles Williams entered the building at 3:42am. I asked him where he was and that he was to call Ms. Gilmore.

Lizzette Danowsky  
Signature

11-3-06  
Date

Dan. L. Gilmore  
Witness Signature

11/3/06  
Date